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February 16, 2009

**VIA FEDERAL EXPRESS OVERNIGHT DELIVERY**

Attn: Compliance Tracker, AE-17J  
Air Enforcement and Compliance Assurance Branch  
U.S. Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604

Dear U. S. EPA Region V Representative:

On or about November 18, 2008, United States Steel Corporation (U. S. Steel) received a Clean Air Act §114 Request for Information regarding its Gary Works. The response required U. S. Steel to provide certain information regarding its Gary Works operations within 30 calendar days of receipt of the Request and submit the requested emissions testing reading results within 90-days of receipt of the Request. In response to that request, on December 18<sup>th</sup>, U. S. Steel provided U. S. EPA with responsive information, noting that it would continue to search for other responsive information and would supplement its response if appropriate. In addition, in that response, U. S. Steel explained, as was previously verbally discussed with U. S. EPA, that it was unable to conduct the requested emissions testing on the No. 1 BOP Shop and No. 8 Blast Furnace because these operations were temporarily idled in light of the current economic downturn. U. S. Steel also explained that emissions testing on Blast Furnace No. 4 were on-going and the results would be submitted by February 16, 2009 in accordance with the Request. Since that submittal, as explained in a voice mail message to Sabrina Argentieri of U. S. EPA, the No. 1 BOP Shop has resumed operations and U. S. Steel is currently conducting the requested emissions testing. The testing is not yet complete. U. S. Steel anticipates completing the emissions testing at the No. 1 BOP Shop by the week of March 23<sup>rd</sup> and will provide the results during that week. The No. 8 Blast Furnace remains temporarily idled.

In response to the EPA Request, U. S. Steel is providing the information and attachments, as discussed below. While responding to these Requests in good faith, U. S. Steel believes that the Requests are unduly burdensome and overly broad, especially to the time frame to which the Requests pertain. U. S. Steel specifically objects to any definition or Request that can be interpreted to impose on U. S. Steel an obligation to collect information greater than that imposed by §114 of the Clean Air Act. Furthermore, U. S. Steel questions the relevance and probative value of these Requests, and by providing a response, U. S. Steel does not concede to the relevance or materiality of the information sought by any request or subject matter to

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which they refer, nor does U. S. Steel waive any such objections. Please note that the responses provided herein or attached shall not constitute any admission of liability on the part of U. S. Steel for any alleged violations.

Subject to the conditions noted above, enclosed herein, please find supplemental responses to Request Nos. 1, 3, 4 and 11 in the EPA Requested received on November 18, 2008.

**1. U. S. EPA REQUEST NO. 1:**

For Blast Furnace 4, provide the operability each month, which is the number of hours that the furnace was in operation relative to the number of possible hours in one month, from January 1980 through December 2007. Also provide the production (tons of hot metal) from Blast Furnace 4 each month for this time period.

**U. S. STEEL RESPONSE:**

*Please refer to the folder, labeled, "Supplemental Response to Request No. 1," in the attached disk. U. S. Steel is providing additional information regarding the hours of operation in that folder. U. S. Steel continues to search for responsive information and reserves the right to supplement its response.*

**3. U. S. EPA REQUEST NO. 3:**

For Blast Furnace 14 (previously Blast Furnace 13 and herein referred to as Blast Furnace 13/14), provide the operability each month, which is the number of hours that the furnace was in operation relative to the number of possible hours in one month, from January 1980 to the present. Also provide the production (tons of hot metal) of Blast Furnace 13/14 each month for this time period.

**U. S. STEEL RESPONSE:**

*Please refer to the folder, labeled, "Supplemental Response to Request No. 3," in the attached disk. U. S. Steel is providing additional information regarding the hours of operation in that folder. U. S. Steel continues to search for responsive information and reserves the right to supplement its response.*

**4. U. S. EPA REQUEST NO. 4:**

For Blast Furnace 13/14, provide the maximum daily production (tons hot metal) actually achieved each month from January 1980 to the present.

**U. S. STEEL RESPONSE:**

*U. S. Steel continues to search for responsive information and anticipates providing a supplemental response to this Request when it provides U. S. EPA with the No. 1 BOP Shop readings, i.e., by March 27<sup>th</sup>.*

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# **11. U. S. EPA REQUEST NO. 11 – EMISSIONS TESTING**

Emissions Testing: U.S. Steel must conduct tests to determine the opacity of particulate matter being emitted to the environment according to the schedule below. Specifically, U.S. Steel must perform the following tests pursuant to 40 . CFR Part 60, Appendix A, EPA Method 9 for:

- The #1 BOP shop roof monitor for four consecutive heats, twice per week (eight heats per week) for eight consecutive weeks.

**U. S. STEEL RESPONSE:** *As previously noted, the No. 1 BOP Shop was idled when the Request was received. Since then, the No. 1 BOP Shop resumed operations and U. S. Steel is in the process of taking the requested readings. U. S. Steel anticipates providing the results of the readings to U. S. EPA by March 27<sup>th</sup>.*

- The Blast Furnace 4 casthouse roof monitor for a period of 4 consecutive hours (while the furnace is being tapped) twice per week for eight consecutive weeks.

**U. S. STEEL RESPONSE:** *U. S. Steel has completed the requested emission testing at Blast Furnace 4 casthouse roof monitor. The readings were taken in accordance with the request during Week 1 on December 1, December 4; during Week 2 on December 8 and December 10; during Week 3 on December 17 and December 19; during Week 4 on December 26 and 27; during Week 5 on December 29 and December 30; during Week 6 on January 5 and January 6; during Week 7 on January 14 and January 15; and during Week 8 on January 20 and January 22. The results are provided in the attached disk in the Folder labeled, "Request No. 11 – BF No. 4 Casthouse Emissions Readings."*

- The Blast Furnace 8 casthouse roof monitor for a period of 4 consecutive hours (while the furnace is being tapped) twice per week for eight consecutive weeks.

**U. S. STEEL RESPONSE:** *Blast Furnace No. 8 was idled prior to U. S. Steel's receipt of the Request and the furnace remains idled. At this time, in light of the current economic downturn, U. S. Steel is uncertain when the furnace will be operating at normal conditions, but it will advise U. S. EPA when the furnace resumes normal production and it will conduct the requested emissions testing accordingly.*

- a. U.S. Steel must begin taking these readings within 2 weeks of receipt of this request,

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- b. The results of these readings and any related information, must be submitted to EPA within 90 days of receipt of this request,
- c. Readings taken for the BOP shop must span the period of all production events, beginning with scrap charge and continuing through the conclusion of slag dumping.
- d. U.S. Steel must record and submit to EPA any operational practice or parameter that existed during the time of the opacity readings that is different from normal conditions,
- e. The following information shall be recorded and submitted with your response (where applicable):
  - 1. Which BOP vessel was in operation during the readings;
  - 2. The time that a tap hole was open and closed during the period readings were taken.

A certification statement regarding this correspondence and all attached information is attached. Should you have any questions regarding this response or the attachments, please contact me.

Very truly yours,



David W. Hacker

cc: Thomas Easterly, Commissioner  
Indiana Department of Environmental Management  
100 North Senate Avenue  
Indianapolis, IN 43204 – cover letter only

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